

THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

LL MILLS and CATHERINE MILLS,
husband and wife, ROBERT SUSS,
DOUG SHINSTINE, JIM JELSMA,
BILL BREMER, NEIL DEMARIS &
FRED McCONKEY, RON
GOODCHILD, GARY LAYLOCK,
KEITH SCHLEMEIN, AL BELCHER,
MARK SHEERAN and RICHARD F.
DEJEAN

Plaintiffs,

vs.

CITY OF SUMNER, a municipal
corporation,

Defendant.

No. CV06-5385RBL

STIPULATION AND PROPOSED
ORDER OF CONTINUANCE FOR
DISCOVERY PLAN DATES

STIPULATION AND REQUEST FOR CONTINUANCE

COME now the parties, City of Sumner Defendant, by and through their undersigned attorneys Brett C. Vinson, City Attorney, and Mary Ann McConaughy, of Keating, Bucklin & McCormack, Inc., P.S., and Plaintiffs, by and through their attorney, Richard F. DeJean, and hereby request and stipulate to an Order that the Discovery due dates pursuant to FRCP 26 are continued as

set forth as follows:

STIPULATION AND PROPOSED ORDER OF
CONTINUANCE FOR DISCOVERY PLAN DATES

(1) that the deadline for Disclosure of Expert Testimony under FRCP 26(a)(2), currently set for July 11, 2007, be continued to August 10, 2007;

(2) that the deadline for filing all discovery motions currently set for August 20, 2007, be continued to September 20, 2007;

(3) that the Discovery completion date currently set for September 10, 2007, be continued to October 10, 2007; and

(4) that the date for all Dispositive Motions, currently scheduled for October 9, 2007, be continued to October 24, 2007.

This request and stipulation is based upon the fact that the attorney representing the Defendant City of Sumner has left the organization and a new City Attorney, Brett C. Vinson, has just come on board within the past two weeks. By continuing the discovery dates as requested, will enable Mr. Vinson to adequately respond and participate in the discovery process.

Dated this 25th day of June, 2007.

CITY OF SUMNER

KEATING, BUCKLIN & McCORMACK, INC., P.S.

s/Brett c. Vinson
Brett C. Vinson, WSBA #30426
City Attorney for the City of Sumner
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s/Mary Ann McConaughy
Mary Ann McConaughy, WSBA # 8406
Attorney for Defendant City of Sumner
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1
2 s/Richard F. DeJean
Richard F. DeJean, WSBA # 2548
3 Attorney for Plaintiffs
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Sumner, WA 98390
5 (253) 863-6047
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6

7 **ORDER**

8 Based upon the above stipulation, it is hereby

9 **ORDERED, ADJUDGED AND DECREED** that the Discovery dates set forth above are
10 continued to the dates as follows:

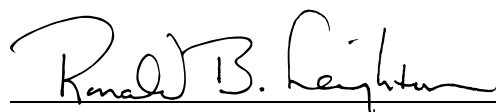
11 (1) the deadline for Disclosure of Expert Testimony under FRCP 26(a)(2), is
12 continued to August 10, 2007;

13 (2) the deadline for filing all discovery motions is continued to September 20, 2007;

14 (3) the Discovery completion date is continued to October 10, 2007; and

15 (4) the date for all Dispositive Motions is continued to October 24, 2007.

16 **DATED** this 26th day of June, 2007.

17
18 

19 RONALD B. LEIGHTON
20 UNITED STATES DISTRICT JUDGE

21 FOR ENTRY

22 NOTICE OF PRESENTMENT WAIVED

23 Brett C. Vinson, WSBA # 30426
24 Attorney for Defendant City of Sumner

Richard DeJean, WSBA # 2548
Attorney for Plaintiffs

25 Mary Ann McConaughy, WSBA # 8406
26 Attorney for Defendant City of Sumner